

# EXHIBIT 2



**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

SOL IP, LLC,

Plaintiff,

v.

AT&T MOBILITY LLC,

Defendant.

v.

SPRINT CORPORATION;  
SPRINT COMMUNICATIONS CO. L.P.;  
SPRINT SOLUTIONS, INC.; and  
SPRINT SPECTRUM L.P.,

Defendants.

v.

VERIZON COMMUNICATIONS INC. and  
CELLCO PARTNERSHIP d/b/a VERIZON  
WIRELESS,

Defendants.

Civil Action No. 2:18-cv-526-RWS-RSP

***CONSOLIDATED LEAD CASE***

**JURY TRIAL DEMANDED**

Civil Action No. 2:18-cv-527-RWS-RSP

Civil Action No. 2:18-cv-528-RWS-RSP

**PLAINTIFF SOL IP'S FIRST AMENDED  
DISCLOSURES PURSUANT TO LOCAL PATENT RULES 3-1 AND 3-2**

Pursuant to Local Patent Rules 3-1 and 3-2, plaintiff Sol IP, LLC ("Sol IP") hereby provides its disclosure of asserted claims and preliminary infringement contentions and accompanying document production. Sol IP's disclosures are based on publicly available materials regarding the accused infringing products of defendants that describe or discuss aspects of operation of these products. Sol IP has not had access to any discovery of defendants'

materials at this point, and certain information is not yet available to Sol IP that may be relevant to its infringement claims. Sol IP reserves the right to supplement or alter its disclosures herein based on additional information obtained concerning defendants' products.

**I. Disclosure of Asserted Claims and Preliminary Infringement Contentions**

**A. Infringed Claims**

The following table identifies the patents-in-suit and each claim of those patents that is alleged to be infringed by each opposing party.

<b>Patent</b>	<b>Infringed Claims</b>
9,603,174	All defendants: 9–12, 14–16, 25–28, 30–32
8,761,814	All defendants: 1–18
9,155,066	All defendants: 1–18
8,270,354	All defendants: 1–8, 10–17
8,311,031	All defendants: 1–13
9,496,976	All defendants: 1–16
10,080,204	All defendants: 1, 4–7, 10–13, 16–19, 22–25, 27–28
8,320,565	All defendants: 1–4
8,320,571	All defendants: 1–7
9,144,064	All defendants: 1–8, 15–20
9,204,438	All defendants: 1–8, 15–20
9,888,435	All defendants: 1–10, 12–21, 23
8,320,337	All defendants: 1–10
8,971,168	All defendants: 1–3, 6–10, 18–25
8,593,936	All defendants: 1, 3, 5, 7–12, 14
10,075,946	All defendants: 1–5, 14–22

Patent	Infringed Claims
10,009,884	All defendants: 1–30
9,265,063	All defendants: 1–4
10,057,095	All defendants: 1–5, 7–12, 14–19, 21–25, 27–31
9,432,940	All defendants: 1–20
9,634,746	All defendants: 1–35
10,090,894	All defendants: 1–30
8,654,881	All defendants: 1–5, 7–27
9,900,067	All defendants: 1–21, 23–27, 30–44
10,045,256	All defendants: 1–26
RE45,466	All defendants: 16–19, 21–24
10,231,211	All defendants: 1–7, 15–33

Sol IP notes that the claims identified in the table reflect the asserted claims in this case, and the absence of a claim from the list does not imply that the claim is not infringed. Sol IP reserves the right to augment and supplement its identification of asserted claims based upon additional information obtained through discovery.

**B. Infringing Instrumentalities**

Based upon information presently available to it, Sol IP asserts infringement by the instrumentalities set forth in the table below.

As used in the table below, “Accused Usage Devices” refers to all mobile devices used on each defendants’ mobile network on or after the issuance of a patent-in-suit, excluding any Excluded Devices; and “Accused Sale Devices” refers to all mobile devices sold by defendants on or after the issuance of a patent-in-suit, excluding any Excluded Devices. “Excluded Devices” refers to (a) any devices produced by [REDACTED]; (b) any devices produced

by [REDACTED]; (c) any devices produced by [REDACTED]; and (d) any devices subject to a valid license paid through [REDACTED] covering the applicable patent during the period (if any) such patent was a part of that pool. Sol IP notes that, to the extent devices excluded as infringing instrumentalities are configured to communicate in accordance with the applicable standards, they do not constitute non-infringing alternatives. “Apple Devices” refers to any devices produced by Apple Inc.

Patent	Infringing Instrumentalities
9,603,174	<p>Claims 9–12, 14–16: All Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with LTE Release 8 (or later), excluding any [REDACTED] Devices.</p> <p>Claims 25–28, 30–32: Each defendants’ mobile network, including all base station equipment configured to communicate in accordance with LTE Release 8 (or later).</p>
8,761,814	<p>All asserted claims: (1) Each defendants’ mobile network, including all base station equipment configured to communicate in accordance with LTE Release 8 (or later); and (2) all Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with LTE Release 8 (or later).</p>
9,155,066	<p>Claims 1–9: All Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with LTE Release 8 (or later).</p> <p>Claims 10–18: Each defendants’ mobile network, including all base station equipment configured to communicate in accordance with LTE Release 8 (or later).</p>
8,270,354	<p>Claims 1–8: Each defendants’ mobile network, including all base station equipment configured to communicate in accordance with LTE Release 8 (or later).</p> <p>Claims 10–17: All Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with LTE Release 8 (or later).</p>
8,311,031	<p>Claims 1–7: All Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with LTE Release 8 (or later).</p> <p>Claims 8–13: All Accused Sale Devices configured to communicate in accordance with LTE Release 8 (or later).</p>
9,496,976	<p>Claims 1–8: All Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with LTE Release 8 (or later).</p> <p>Claims 9–16: Each defendants’ mobile network, including all base station equipment configured to communicate in accordance with LTE Release 8 (or later).</p>

Patent	Infringing Instrumentalities
10,080,204	<p>Claims 1, 4–7, 10–12, 25, 27–28: All Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with LTE Release 8 (or later).</p> <p>Claims 13, 16–19, 22–24: Each defendants’ mobile network, including all base station equipment configured to communicate in accordance with LTE Release 8 (or later).</p>
8,320,565	<p>Claims 1–4: All Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with LTE Release 8 (or later).</p>
8,320,571	<p>All asserted claims: All Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with LTE Release 8 (or later).</p>
9,144,064	<p>Claims 1–8, 15–20: All Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with LTE Release 8 (or later).</p>
9,204,438	<p>Claims 1–8, 15–20: Each defendants’ mobile network, including all base station equipment configured to communicate in accordance with LTE Release 8 (or later).</p>
9,888,435	<p>Claims 1–10, 12–21, 23: Each defendants’ mobile network, including all base station equipment configured to communicate in accordance with LTE Release 8 (or later).</p>
8,320,337	<p>Claims 1–4, 9: All Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with LTE Release 8 (or later).</p> <p>Claims 5–8, 10: Each defendants’ mobile network, including all base station equipment configured to communicate in accordance with LTE Release 8 (or later).</p>
8,971,168	<p>Claims 1–3, 6–10: All Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with LTE-A Release 10 (or later).</p> <p>Claims 18–25: Each defendants’ mobile network, including all base station equipment configured to communicate in accordance with LTE-A Release 10 (or later).</p>
8,593,936	<p>Claims 1, 3, 5, 7–11: All Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with LTE-A Release 10 (or later).</p> <p>Claims 12, 14: Each defendants’ mobile network, including all base station equipment configured to communicate in accordance with LTE-A Release 10 (or later).</p>
10,075,946	<p>Claims 1–5, 14, 16–18, 20–22: All Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with LTE-A Release 10 (or later).</p> <p>Claims 15, 19: All Accused Usage Devices and Accused Sale Devices configured</p>

Patent	Infringing Instrumentalities
	to communicate in accordance with LTE-A Release 11 (or later).
10,009,884	<p>Claims 1–6, 19–24: Each defendants’ mobile network, including all base station equipment configured to communicate in accordance with LTE Release 8 (or later).</p> <p>Claims 7–18, 25–30: All Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with LTE Release 8 (or later).</p>
9,265,063	<p>Claims 1–2: All Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with LTE Release 8 (or later).</p> <p>Claims 3–4: Each defendants’ mobile network, including all base station equipment configured to communicate in accordance with LTE Release 8 (or later).</p>
10,057,095	All asserted claims: (1) All Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with IEEE 802.11ac (or later), excluding any [REDACTED] Devices, and (2) the AT&T Hotspot System, including all access points configured to communicate in accordance with IEEE 802.11ac (or later).
9,432,940	All asserted claims: (1) All Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with IEEE 802.11ac (or later), excluding any [REDACTED] Devices, and (2) the AT&T Hotspot System, including all access points configured to communicate in accordance with IEEE 802.11ac (or later).
9,634,746	All asserted claims: (1) All Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with IEEE 802.11ac (or later), excluding any [REDACTED] Devices, and (2) the AT&T Hotspot System, including all access points configured to communicate in accordance with IEEE 802.11ac (or later).
10,090,894	<p>All asserted claims: All Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with IEEE 802.11ac (or later), excluding any [REDACTED] Devices.</p> <p>Claims 1–14, 17–20, 23–30: The AT&amp;T Hotspot System, including all access points configured to communicate in accordance with IEEE 802.11ac (or later).</p>
8,654,881	All asserted claims: (1) All Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with IEEE 802.11ac (or later), excluding any [REDACTED] Devices, and (2) the AT&T Hotspot System, including all access points configured to communicate in accordance with IEEE 802.11ac (or later).
9,900,067	<p>All asserted claims: All Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with IEEE 802.11ac (or later), excluding any [REDACTED] Devices.</p> <p>Claims 1–2, 5–6, 9–11, 16–44: The AT&amp;T Hotspot System, including all access points configured to communicate in accordance with IEEE 802.11ac (or later).</p>

Patent	Infringing Instrumentalities
10,045,256	All asserted claims: (1) All Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with IEEE 802.11ac (or later), excluding any [REDACTED] Devices, and (2) the AT&T Hotspot System, including all access points configured to communicate in accordance with IEEE 802.11ac (or later).
RE45,466	Claims 16–19: All Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with LTE Release 8 (or later). Claims 21–24: Each defendants’ mobile network, including all base station equipment configured to communicate in accordance with LTE Release 8 (or later).
10,231,211	Claims 1–7, 29–33: All Accused Usage Devices and Accused Sale Devices configured to communicate in accordance with LTE Release 8 (or later). Claims 15–28: Each defendants’ mobile network, including all base station equipment configured to communicate in accordance with LTE Release 8 (or later).

“Accused Usage Devices” and “Accused Sale Devices” include, but are not limited to, the devices identified below, except for any Excluded Devices.

For AT&T defendant:

- Alcatel Cameox
- Alcatel Tetra
- Apple iPhone 6 / 6s / 6s Plus
- Apple iPhone 7 / 7 Plus
- Apple iPhone 8 / 8 Plus
- Apple iPhone X / XR / XS / XS Max
- AT&T Cingular Flip 2
- Blackberry KEYone
- Kyocera DuraForce PRO
- LG G8 ThinQ
- LG K20
- LG K30
- LG Phoenix 3
- LG Phoenix 4
- LG Phoenix Plus
- LG Stylo 4+
- LG V30
- LG V35 ThinQ
- LG v40 ThinQ
- LG X Venture
- Motorola moto g play 6th Gen



- Moto Z2 Force Edition
- Razer Phone 2
- Red Hydrogen One
- Sonim XP5s
- Sonim XP8
- ZTE Axon M
- ZTE Blade Spark
- ZTE Maven 3
- Apple iPad
- Apple iPad mini4
- Apple iPad Pro
- Lenovo moto tab
- Apple Watch Series 3 / Series 4
- Arlo Go
- AT&T Unite Express 2
- AT&T Velocity USB Stick
- AT&T Wireless Internet
- Harman Spark
- Netgear Nighthawk Hotspot Router
- Netgear Nighthawk LTE Mobile Hotspot Router

For Sprint defendants:

- Alcatel GO FLIP
- Apple iPhone 6s / 6s Plus
- Apple iPhone 7 / 7 Plus
- Apple iPhone 8 / 8 Plus
- Apple iPhone XR / Xs / Xs Max
- Apple iPhone X
- CAT S48c
- Essential Phone
- HTC One A9
- Kyocera DuraForce PRO
- Kyocera DuraTR
- Kyocera DuraXTP
- LG G7 ThinQ
- LG K30
- LG Stylo 4
- LG Tribute Dynasty / Tribute Empire
- LG V40ThinQ
- moto e4
- moto e5 Play / e5 plus
- moto z3 play
- Sonim XP5s

- Sonim XP8
- ZTE Max XL
- Apple iPad
- Apple iPad mini 4
- Apple iPad Pro
- LG G Pad F2 8.0
- Sprint Drive

For Verizon defendants:

- Apple iPhone 6 / 6s / 6s Plus
- Apple iPhone 7 / 7 Plus
- Apple iPhone 8 / 8 Plus
- Apple iPhone X / XR / XS / XS Max
- ASUS ZenFone V Live
- Google Pixel 2 XL
- Google Pixel
- Google Pixel 3 / 3 XL
- Kyocera DuraForce PRO2 with Sapphire Shield
- LG G7 ThinQ
- LG V40 ThinQ
- Motorola moto e5 play
- Motorola moto g
- Motorola moto g6
- Motorola moto z3
- Red Hydrogen One
- Apple iPad / iPad Pro / iPad mini
- Apple Watch Series 3 / Series 4
- Fitbit Ionic
- Garmin vivoactive HR
- Gizmo Disney Band for GizmoWatch
- Verizon GizmoWatch
- Verizon Ellipsis Jetpack MHS900L
- Verizon Global Modem USB730L
- Verizon Jetpack MiFi 7730L
- Verizon Jetpack MiFi 8800L

More complete information about the devices that defendants have sold or that have been used on defendants' networks that are configured to communicate in accordance with LTE Release 8 (or later), LTE-A Release 10 (or later), LTE-A Release 11 (or later), and/or IEEE 802.11ac (or later) is in the possession of defendants and is expected to be obtained through discovery. Any

additional devices are included within the scope of “Accused Sale Devices” and “Accused Usage Devices,” regardless whether listed above.

Upon information and belief, defendants’ base station equipment includes equipment provided by vendors including Ericsson, Nokia, Cisco, HP Enterprises, Alcatel-Lucent, and/or others. More complete information about the devices that defendants utilize in their mobile networks that are configured to communicate in accordance with LTE Release 8 (or later), LTE-A Release 10 (or later), and/or LTE-A Release 11 (or later) is in the possession of defendants and is expected to be obtained through discovery.

More complete information about the devices that AT&T utilizes in the AT&T Hotspot System that are configured to communicate in accordance with IEEE 802.11ac (or later) is in the possession of AT&T and is expected to be obtained through discovery.

Sol IP reserves the right to augment and supplement its preliminary identification of infringing products based upon additional information obtained through discovery.

**C. Claim Charts for Literal Infringement**

Sol IP’s preliminary infringement charts are provided as attached Exhibits A1–A27, which map the applicable standards to the asserted claims. In each claim chart, the discussion for dependent claims should be read as incorporating by reference the discussion corresponding to the claims on which they depend. In addition, the discussion for each row in the chart should be read within the context of the discussion for the entire claim to which that row pertains. Where the charts incorporate excerpts of particular versions of technical specification documents, the reference to those versions is exemplary and not to the exclusion of any prior or subsequent versions of the document or any versions of related documents.

In the charts, unless otherwise indicated, “user equipment” (“UE”) refers to Accused Usage Devices and Accused Sale Devices, and “station” (“STA”) refers to Accused Usage Devices, Accused Sale Devices, and access points in the AT&T Hotspot System.

Sol IP reserves the right to augment and supplement its preliminary claim charts based upon additional information obtained through discovery.

**D. Doctrine of Equivalents**

Unless otherwise noted in the claim charts, Sol IP alleges that defendants infringe literally all claims identified above. To the extent any differences are alleged to exist between the above-identified claims and defendants’ infringing conduct, such differences are insubstantial and defendants’ products and processes perform substantially the same function, in substantially the same way, to yield substantially the same result, and therefore defendants infringe under the doctrine of equivalents.

Sol IP reserves the right to augment and supplement its disclosure concerning the doctrine of equivalents based upon additional information obtained through discovery or based upon the Court’s claim construction.

**E. Priority Claim to an Earlier Application**

The table below shows, for patents that claim priority to an earlier application, the priority date to which each asserted claim is entitled based on such earlier application.

Patent	Claims	Priority Date from Earlier Application
9,603,174	all asserted claims	12/16/2002, as well as the dates of any subsequent applications
8,761,814	1–8, 10–17	4/26/2006, as well as the dates of any subsequent applications
	9, 18	4/20/2007, as well as the dates of any subsequent applications
9,155,066	1–2, 4–11, 13–18	4/26/2006, as well as the dates of any subsequent applications

any such document evidences a disclosure of any claimed invention, that the document predates any application, or that such document evidences or is prior art under 35 U.S.C. § 102.

**B. Local Patent Rule 3-2(b)**

Sol IP identifies the following documents as potentially responsive to P.R. 3-2(b): ETRI-000001 to ETRI-0000779.

**C. Local Patent Rule 3-2(c)**

Sol IP identifies the following documents as responsive to P.R. 3-2(c): SOL-FH-0000001 to SOL-FH-0039492.

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By: /s/ Max L. Tribble Jr.

Max L. Tribble Jr.  
Texas State Bar No. 20213950  
mtribble@susmangodfrey.com  
Joseph S. Grinstein  
Texas State Bar No. 24002188  
jgrinstein@susmangodfrey.com  
Bryce T. Barcelo  
Texas State Bar No. 24092081  
bbarcelo@susmangodfrey.com  
**SUSMAN GODFREY LLP**  
1000 Louisiana Street, Suite 5100  
Houston, TX 77002  
Telephone: (713) 651-9366  
Facsimile: (713) 654-6666

Kalpana Srinivasan  
California State Bar No. 237460  
ksrinivasan@susmangodfrey.com  
Kathryn P. Hoek  
California State Bar No. 219247  
khoek@susmangodfrey.com  
**SUSMAN GODFREY LLP**  
1900 Avenue of the Stars, Suite 1400  
Los Angeles, CA 90067  
Telephone: (310) 789-3100  
Facsimile: (310) 789-3150